

EXHIBIT G

Laura Mazur

Nov 11 2019

Mr. Joseph E. Field, Esq.
Littler Mendelson, P.C.
900 Third Avenue, 8th Floor
New York, NY 10022

Re: Fox, D'Auria and Shwiner v. Starbucks Corporation

Dear Mr. Field,

This letter will serve as an acknowledgement of receipt of your subpoena dated 10/25/19, received by process server on 10/29/19, in the matter of Fox, D'Auria and Shwiner v. Starbucks Corporation.

I must inform you that as of 3/29/19, AVP Termite and Pest Control of New York, Inc was sold and has effectively ceased business operations and no longer has any employees, an office or any ongoing business activities.

As AVP closed for business, I disposed of a majority of AVPs files/documents/computers/equipment but am producing any information I have, as is listed on page 2 of this correspondence. As it is required of me, If after producing the documents you have requested, I locate additional responsive documents, I will promptly forward them to you.

With reference to your request to produce any workorders, service requests, work tasks or invoices, I do have approximately 5 boxes of workorders/service requests/invoices from 2015 to 2018 which are in storage on Staten Island, NY.

While I understand that subpoenas are legal requirements and I want to follow all laws, I unfortunately must object to the burden and expense of complying with your subpoena regarding delivery and/or copying all these documents. I am a 73-year-old retired woman and do not have the strength nor the resources to move around these boxes, let alone go through them and copy everything for you. I would be happy to make those boxes available to you to copy yourself, as long as they are promptly returned to me in their original condition since AVP needs to preserve those records.

Please let me know if we can agree on this process. I am hoping that you will understand so that we can find a way to cooperate on this matter.


Laura Mazur

DOCUMENTS TO BE PRODUCED

1. All contracts or agreements between AVP and Starbucks
AVP: Providing agreement from 2012
2. All instructions for requests Starbucks communicated to AVP concerning the services that AVP provided to Starbucks
AVP: Providing signed Starbucks Supplier Code of Conduct
3. All instructions or requests AVP communicated to Starbucks concerning the services that AVP provided to Starbucks
AVP: Unable to locate any written communications at this time. Should any be located, we will provide to Mr. Field
4. All documents concerning the terms of service between AVP and Starbucks
AVP: Providing signed Starbucks Supplier Code of Conduct and Providing agreement 2012
5. All work orders, service requests or work tasks issued or received by a AVP on the Starbucks account
AVP: Documents are being made available to Mr. Field, Esq to inspect and or copy
6. Any insurance policies issued to AVP in connection with the services provided to Starbucks
AVP: Providing copies of COI 2013 to 2018
7. All inspection reports or audits issued by a AVP concerning the stores
AVP: Providing access to Mr. Field, Esq. to any reports/audits that may be in storage
8. All invoices or bills issued by AVP to Starbucks
AVP: Providing access to Mr. Field, Esq. to any invoices that may be in storage
9. AVP's personnel files or employment files maintained on D'Auria and Shwiner
AVP: Unable to locate any personnel/employment files at this time. Should any be located, will provide to Mr. Field
10. AVP's employee Handbook in effect during the period from 2015 to 2018
AVP: Unable to produce employee Handbook- unable to locate.
11. Any formal or informal discipline or counseling issued by AVP to D'auria or Shwiner
AVP: There was never any formal or informal disciplinary action or counseling issued by AVP to D'auria or Shwiner
12. Any complaints that AVP received concerning D'auria or Shwiner
AVP: There was never any complaints received by AVP concerning D'Auria or Shwiner

DOCUMENTS TO BE PRODUCED

13. AVP's job description for operations director or any other positions held by Shwimer at AVP

AVP: Job description for operations director or any other positions held by Shwimer at AVP (including but not limited to):

- Account Manager for Starbucks Account Responsible for overseeing scheduling for regular service calls, emergency service call distribution, correspondence/communication, invoicing, providing education meetings at request of Starbucks to Facility Managers, District Managers and any other Management Team deemed necessary by Starbucks.
- Monitoring pest tech route and that workorders are successfully completed
- Monitor and ensuring NYS and NYC regulatory compliance and safety standards/procedures are met or exceeded
- Responding to AVP customer concerns, questions and/or troubleshooting
- Conduct interior and exterior troubleshooting onsite inspections (with and without customers) to identify and document pest activity and conducive conditions and implement Plan of Action to resolve issues
- Inspecting and evaluating the performance of Pest Technicians
- Facilitating continual training of Pest Technicians
- Conduct and lead ongoing training meetings, contribute to training plans and participate in field training for both AVP technicians and AVP Customers.
- Works closely with technicians for continuous improvement and business retention.

14. AVP's job description for pest control technician or any other positions held by D'Auria at AVP

AVP: Job description for pest control technician or any other positions held by D'Auria at AVP (including but not limited to):

- Responsible for servicing, communication and assist with scheduling (regular and emergency service calls) for Starbucks Account
- Responsible for using a variety of pest control methods, providing a strong line of communication to Store Managers and Facility Service Managers documenting and identifying, document and communicate pest activity, repairs required to control or prohibit pest activity, identify, document and communicate conditions conducive to pest activity and/or a condition creating a potential NYC DOH violation.
- Developing strategies to solve and prevent pest problems in Starbucks locations
- Practice and implement proper IPM (Integrated pest management) strategies
- Maintain and keep organized company vehicle.
- Maintaining knowledge and implementation of applicable laws, rules, and regulations governing pesticide application in (including documenting illegal pesticide use). This also includes knowing the biology and morphology of a variety of pests and vermin
- Attend continued educations classes/seminars to obtain proper NYSDEC credits necessary to keep PCO license current